

EXHIBIT I

CLARKE & RICE, APC
1010 SECOND AVENUE, STE. 1800
SAN DIEGO, CALIFORNIA 92101
(619) 308-8484

FEDERAL PUBLIC DEFENDER OFFICE
DISTRICT OF MASSACHUSETTS
51 SLEEPER STREET, FIFTH FLOOR
BOSTON, MASSACHUSETTS 02210
(617) 223-8061

DAVID I. BRUCK
220 SYDNEY LEWIS HALL
LEXINGTON, VA 24450
(540) 458-8188

July 29, 2014

Nadine Pellegrini
Aloke Chakravarty
William Weinreb
Assistant U.S. Attorneys
United States Courthouse
1 Courthouse Way, Suite 9200
Boston, Massachusetts 02210

Re: United States v. Dzhokhar Tsarnaev
Criminal No. 13-10200- GAO

Dear Counsel:

We write to request the following:

1. All pages to the so-called "Twitter Scrub" produced at DT-0033586.
2. [REDACTED]
3. Any reports of psychological profiling of Tamerlan Tsarnaev by the FBI or any other law enforcement agency.
4. Additional information regarding a notebook identified by the Quantico laboratory as Q715. We were provided photographs of pages of this notebook; the photographs provided begin at DT-0056613 and feature handwriting. There are three pages of handwriting displayed in the photographs. In our summary of Quantico items, however, there is a listing of sub-items Q715.1-Q715.118, indicating that many more pages were likely analyzed and/or photographed. Please provide us with the additional photographs connected with this item, and images of all other pages of the notebook that have content if not previously photographed.
5. In regard to the email account featuring the [REDACTED] DT-0061444, please provide us with the following: (1) the email content in its native format (rather than in the .pdf's provided), (2) any account information

associated with the email address, and (3) the genesis of the material, i.e., how the material was obtained by the government or other law enforcement personnel.

6. The identity of the source of the two iPhones, evidence numbers 1B2603 and 1B2604, referred to in DT-0064164, along with forensic copies of the data obtained from them as described in the report.

7. [REDACTED]

8. [REDACTED]

9. On page 7 of his report of April 3, 2014 (provided to us on June 30, 2014), FBI forensic examiner Michael D. McFarlane writes:

[REDACTED]

Please provide us with the report detailing this process. Specifically, please provide us with details regarding how the memories of the specimen and exemplar were removed and read and how their bind codes were determined. Please include in the description whether the procedure can be replicated, or whether removal of the memory from Q178 resulted in the destruction of Q178.

10. Any reports (including video documentation) of attempted or actual construction and detonation of any facsimiles of the pressure cooker and other explosive devices modeled on the devices thought to have been used at the Boston Marathon Bombing, the Laurel Street, Watertown scene, or recovered from the Mercedes abandoned on Spruce Street, Watertown.
11. The Genetic Analysis data files underlying the nuclear and mitochondrial analysis of DNA samples conducted by the FBI laboratory on the various items listed in your June 30, 2014 expert summary.

12. Your letter of July 3, 2014 indicated you were following up on our request for the Classified April 10, 2014 Inspectors General Report, but needed additional time to respond. [REDACTED]

[REDACTED] Please let us know the date by which you will respond or provide those items.

Sincerely,

/s/ Timothy Watkins

David I. Bruck
Judy Clarke
Miriam Conrad
William Fick
Timothy Watkins

Counsel for Dzhokhar Tsarnaev